

Jonathan R. Doolittle
REED SMITH LLP
101 Second Street
Suite 1800
San Francisco, CA 94105-3659
Telephone: +1 415 543 8700
Facsimile: +1 415 391 8269

Attorney for Creditors,
Lodi Gas Storage, L.L.P.
Wild Goose, LLC

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re

PG&E Corporation,

Debtor.

No.: 19-30088

No.: 19-30089

Chapter 11

**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICE AND SERVICE
OF PAPERS**

PLEASE TAKE NOTICE that Lodi Gas Storage, L.L.P., (“Lodi”) and Wild Goose, LLC (“Wild Goose”), creditors and parties in interest, by and through their counsel, Reed Smith LLP, hereby enter their appearance pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure.

PLEASE TAKE FURTHER NOTICE that counsel for Lodi and Wild Goose hereby requests pursuant to Rules 2002, 3017(a), 9007, and Section 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or required to be given in these cases, and copies of all papers served or required to be served in these cases, shall be given to and served upon Reed Smith at the following addresses:

Jonathan R. Doolittle, Esq.
Reed Smith LLP
101 Second Street, Suite 1800
San Francisco, CA 94105
415.543.8400 (phone)
415.391.8269 (fax)
jdoolittle@reedsmith.com

Monique B. Howery (*pro hac vice* pending)
Reed Smith LLP
10 S. Wacker Drive, 40th Floor
Chicago, IL 60606
312.207.2417 (phone)
312.207.6400 (fax)
mhowery@reedsmith.com

1 **PLEASE TAKE FURTHER NOTICE** that the foregoing request includes without limitation,
2 all orders, applications, pleadings, motions, petitions, requests, schedules, statements, complaints or
3 demands, whether formal or informal, arising herein or in any way related to these cases, including in
4 adversary proceedings.

5 **PLEASE TAKE FURTHER NOTICE** that Lodi and Wild Goose do not, by filing this *Notice*
6 *of Appearance and Request for Notice and Service of Papers*, nor any subsequent appearance,
7 pleading, claim or suit, submit to the jurisdiction of the Bankruptcy Court or intend that this *Notice of*
8 *Appearance and Request for Notice and Service of Papers* constitute a waiver of any of their rights:
9 (i) to have final orders in non-core matters entered only after *de novo* review by a District Judge; (ii)
10 to trial by jury in any proceeding so triable in these cases, or any controversy or proceeding related to
11 these cases; (iii) to have the District Court withdraw the reference in any matter subject to mandatory
12 or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs or recoupments
13 to which they may be entitled, which they expressly reserve.
14

15 DATED: January 29, 2019

16 REED SMITH LLP

17
18 By: /s/ Jonathan R. Doolittle
19 Jonathan R. Doolittle (SBN 290638)
20 Email: jdoolittle@reedsmith.com
21 Reed Smith LLP
22 Attorneys for Creditors,
23 *Lodi Gas Storage, L.L.P.*
24 *Wild Goose, LLC*
25
26
27
28